Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Facility:	Process(es) Covered:	Date:

X. INCIDENT INVESTIGATION PROGRAM		
A. PROCEDURE/POLICY REVIEW		

1) **EXISTENCE, STRUCTURE AND FORMAT OF INCIDENT INVESTIGATION PROCEDURE**	**NAC Ref.**	**Resp. Code**
i. Does a well-defined program for conducting Incident Investigations appear to exist (i.e., are the following Sections 2 through 7 satisfied)?	459.95429	

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) **INITIATION OF AN INCIDENT INVESTIGATION**	**NAC Ref.**	**Resp. Code**
i. Does the procedure require the investigation of any incident that meets the definition of a catastrophic release?	459.95429(1)	
ii. Does the procedure require the investigation of any incident that could reasonably have resulted in a catastrophic release?	459.95429(1)	
iii. Does the procedure require corrective action to be taken?	459.95429(1)	
iv. Does the procedure require initiation of the investigation within 48 hours?	459.95429(2)	

Notes/Comments Pertaining to Responses to Questions under Issue 2):

3) **ESTABLISHEMENT OF AN INCIDENT INVESTIGATION TEAM**	**NAC Ref.**	**Resp. Code**
i. Does the procedure require that the investigation team have at least two members?	459.95429(3)	
ii. Does the procedure require that one team member is an individual that is knowledgeable in the process where the incident occurred?	459.95429(3a)	
iii. Does the procedure require that a contractor be a team member if that contractor's work was involved in the incident?	459.95429(3a)	
iv. Does the procedure require that a person with some defined level of knowledge and experience in conducting incident investigations be on the team?	459.95429(3b)	

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

Notes/Comments Pertaining to Responses to Questions under Issue 3):

4) PREPARING AN INCIDENT INVESTIGATION REPORT	NAC Ref.	Resp. Code
Does the procedure require development of an incident investigation report that includes: i. Date of the incident?	459.95429(4a)	
ii. Date the investigation began?	459.95429(4b)	
iii. Incident description?	459.95429(4c)	
iv. Factors contributing to the incident?	459.95429(4d)	
v. Recommendations that resulted from the investigation?	459.95429(4e)	

Notes/Comments Pertaining to Responses to Questions under Issue 4):

5) ADDRESSING INCIDENT INVESTIGATION RECOMMENDATIONS	NAC Ref.	Resp. Code
i. Does the procedure establish a system to ensure that all findings and recommendations are addressed and resolved in a prompt manner?	459.95429(5)	
ii. Does the procedure establish a system to track the implementation of the recommendations?	459.95429(5)	
iii. Does the procedure establish a system to document all problem solutions and corrective actions taken as a result of the incident investigation?	459.95429(6)	

Code * : Y = Yes, N = No, NA = Not Applicable, U = Undetermined, P = Partially Satisfied, NR = Not Reviewed, R = Reviewed

X-2

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

Notes/Comments Pertaining to Responses to Questions under Issue 5):

6)	**REVIEWING INCIDENT INVESTIGATION AND REPORT RETENTION**	NAC Ref.	Resp. Code
i.	Does the procedure establish a system to review the incident investigation report with affected employees?	459.95429(7)	
ii.	Does the procedure establish a system to ensure that affected contractors are included in the review?	459.95429(7)	
iii.	Does the procedure establish a system to retain incident investigation reports for five years?	459.95429(8)	

Notes/Comments Pertaining to Responses to Questions under Issue 6):

7)	**IMPLEMENTATION OF INCIDENT INVESTIGATIONS**	NAC Ref.	Resp. Code
i.	From the records audit in Part B, does it appear that all incidents were investigated as required?	459.95429(1)	
ii.	From the records audit in Part B, does it appear that incident investigation reports are being retained for the required 5-year period?	459.95429(8)	
iii.	From the records audit in Part B, does it appear that incident investigations are being conducted pursuant to CAPP regulation?	459.95429	

Notes/Comments Pertaining to Responses to Questions under Issue 7):

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

General Procedure/Policy Review Notes/Comments:

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X-4

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

B. ON-SITE INSPECTION - RECORDS AUDIT

1)	DETERMINATION THAT INCIDENT INVESTIGATION REQUIREMENTS ARE SATISFIED	NAC Ref.	Resp. Code
a.	From information provided by the facility and on-site observation, does it appear that any incident that resulted in, or could reasonably have resulted in, a catastrophic release of a substance had a documented incident report?	459.95429(1)	
b.	From information provided by the facility and on-site observation, does it appear that incident reports are being retained for at least 5 years after the date of the incident?	459.95429(8)	

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2)	SELECT 2 TO 4 COMPLETED INCIDENT INVESTIGATION REPORTS TO REVIEW AGAINST ACTUAL PRACTICE. LIST ON THE FOLLOWING TABLE:			
#	Report ID #	Description/Summary of Incident	Date of Incident	Invest. Start Date
i				
ii				
iii				
iv				

	Inquiry/Observation	Resp. Code :			
		i	ii	iii	iv
a.	Is date and time that the incident identified?				
b.	Is date that the investigation began identified?				
c.	Did investigation begin within 48 hours of the incident?				
d.	Is a description of the incident provided?				
e.	Are the investigation team members identified?				
f.	Does at least one team member appear to be knowledgeable of the process involved?				
g.	Is there evidence that contractor staff was represented on the team, if a contractor employee's work was involved in the incident?				
h.	Does at least one team member appear to have appropriate knowledge and experience to investigate and analyze the incident?				
i.	Have contributing factors and root causes been identified?				
j.	Are the team's proposed recommendations to reduce or eliminate chance of re-occurrence documented?				

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

k. Were the findings evaluated in the report, and were the recommendations tracked through an established system?				
l. Were any solutions and corrective actions taken documented?				
m. Is there documented evidence that the report was reviewed with all effected personnel whose job tasks are relevant to the report findings?				
n. Is there documented evidence that the report was reviewed with contractor employees whose job tasks are relevant to the report findings?				
o. Based on the Response Codes used to complete items a - n above, is it possible to confirm that an Incident Investigation was performed in accordance with program requirements?				

Notes/Comments Pertaining to Responses to Questions under Issue 2):

General On-Site Inspection Notes/Comments:

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

	C. INTERVIEWS
1)	**SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE INCIDENT INVESTIGATION PROCEDURE/POLICY USING THE FOLLOWING QUESTION SETS.** (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)

Question Set	Question Options/Phrasing
a	What is your job description and associated tasks?
b	Do you know what the Incident Investigation program is, and why it exists? How does the Incident Investigation process work? Who performs Incident Investigations?
c	What types of incidents must be investigated?
d	How are you involved in the incident investigation process?
e	Have you ever been involved in an incident that was investigated? Have you ever been involved in investigating an incident?
f	Have the results of an incident investigation report ever been reviewed with you?
g	Are you aware of incidents that have not been investigated?
h	Do you think that the incident investigation reports accurately indicate what went wrong and that appropriated corrective actions were taken? Do you feel that the Incident Investigation program could be improved? How?

Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist – **Incident Investigation**

Revision: aa, July 15, 2004

C. INTERVIEWS			
2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS (LISTED ON THE FIRST PAGE OF SECTION C)			
Employee Profile			
Job Title/Position	**Department/Unit/Group**	**Time in Job**	**Time w/Co.**

Response to Question Set _:

Response to Question Set _:

Response to Question Set _:

Response to Question Set _: